

January 8, 2003

Gary J. Brower, Esq.
Attn. DEP Docket Number 28-02-10/347
Office of Legal Affairs
New Jersey Department of Environmental Protection
P.O. Box 402
Trenton, NJ 08625-0402

7:9B-1.14 WMA 5 Supports the C1 Designation for Oradell Reservoir and Recommends Similar Protection for Related Reservoirs and Streams in the Upper Hackensack Watershed. (WMA 5)

Dear Mr. Brower:

This comment is submitted to support the proposed revision to the Surface Water Quality Standards, whereby the Oradell Reservoir will receive heightened water quality protection by designation as Category One Waters. The Oradell Reservoir is a vital component of United Water New Jersey's system that serves as the primary water supply source for over three-quarters of a million people in Bergen and Hudson Counties. Its designation for increased protection is therefore critical from a public health perspective, and will also serve to enhance the ecological and environmental value of this vital resource.

Further, we wish to take this opportunity to recommend that the following water bodies be designated as Category One Waters also. These reservoirs and streams should be considered integral with the Oradell Reservoir from a water supply, hydrological and ecological perspective:

- Lake Tappan Reservoir
- Woodcliff Lake Reservoir
- Upper Hackensack River
- Pascack Brook

The Upper Hackensack River and the Pascack Brook flow into New Jersey from New York State, and along with the two reservoirs lie entirely within Watershed Management Area 5 (WMA 5). This management area spans from the New York State border to Newark Bay, and includes 61 municipalities in Bergen and Hudson Counties. The WMA 5 Public Advisory Committee (PAC) is comprised of approximately 100 stakeholders in the watershed, representing a broad spectrum of interests. This group has decided by consensus that additional protection is required to preserve the integrity and quality of the Oradell Reservoir as well as the water bodies cited above.

These streams and reservoirs comprise the major surface water features of the Upper Hackensack River Watershed. A review of United Water's operation clearly indicates that the three reservoirs, Oradell, Woodcliff Lake and Lake Tappan are operated as an integral system. They are also located very close to each other, so that any water quality degradation in the upstream reservoirs will quickly result in similar degradation of the water quality of the Oradell Reservoir. In addition, protection of the Upper Hackensack River and Pascack Brook is as critical as it is for the three reservoirs in this system. These two major streams contribute more than 50 percent of the water entering the Oradell Reservoir.

The threat to the quality of our water supply in Bergen County is very real. Bergen is the most populated County in the State, with a population that is steadily increasing. This large number of people in a highly developed watershed has contributed to the negative impact on specific water quality parameters such as nutrients and sodium. The three reservoirs are highly eutrophic; sodium levels at times exceed USEPA secondary drinking water standards; and sedimentation and trash "floatables" are a constant problem. In addition, the three reservoirs are shallow as compared to others in the tri-state area. With an approximate depth of only 20 feet, they tend to dry up quickly, particularly in drought times, thereby concentrating pollutants and sediment loads.

In summary, we believe that designation of Oradell Reservoir, Lake Tappan Reservoir, Woodcliff Lake Reservoir, and the Upper Hackensack River and Pascack Brook as Category One Waters is essential to protect the quality of this vital resource. The threat posed by additional development of recharge areas in the Upper Hackensack River Watershed is a major concern to those of us comprising WMA 5.

Thank you for your consideration of this urgent matter.

Sincerely,

Russell J. Furnari
WMA 5 PAC Chairman

Arnold S. Vernick, PE
WMA 5 Coordinator